

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISIONFILED  
NOV - 5 2019  
CLERK'S OFFICE  
DETROIT

UNITED STATES OF AMERICA,

CRIM. CASE NO: 95-CR-50061

Plaintiff,

HONORABLE BERNARD A. FRIEDMAN  
SENIOR U.S. DISTRICT JUDGE

v.

DION ERIC SAVAGE, SR.,

Defendant.

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## SUPPLEMENTAL MOTION

NOW COMES Dion Savage, proceeding Pro Se in the above captioned-matter.

Mr. Savage moves the Court, in the interests of justice and in accord with Due Process, to Supplement his 1SA motion with a recent case. In U.S. v. Walker, No. 95-CR-101 (N.D.N.Y. Oct. 25, 2019), the government not only conceded that Section 848(b) was a "covered offense," but also that Section 404 and Supreme Court precedent make clear that a "covered offense" is determined by the "statute of conviction," not "actual conduct" or "relevant conduct." This holding is in accord with Maupin, supra, No. 19-6817 (4th Cir. 2019). The Court in Walker resentenced Mr. Tommy Walker to "time served." Thus, Mr. Savage implores the Court to follow Walker and resentenced me to "time served."

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing Supplemental Motion has been placed in U.S. First Class Mail, this day of October 31, 2019, with the postage prepaid to the party below:

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